

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

TARA F. BALDRIGE, )  
formerly known as )  
TARA F. OWENS, )  
on behalf of herself and ) Case No. 07-CV-6042  
the classes defined herein, )  
Plaintiff, ) Judge Pallmeyer  
vs. )  
PALISADES ACQUISITION XVI, LLC, )  
et. al., )  
Defendants. )

**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**

Defendants, PALISADES ACQUISITION XVI, LLC and BLATT, HASENMILLER, LEIBSKER & MOORE, LLC, by one of their attorneys, Stephen D. Vernon, pursuant to Federal Rule of Civil Procedure 6(b), respectfully request that this Court grant them a 28-day enlargement of time to file a responsive pleading to Plaintiff's Complaint, and in support thereof, state as follows:

1. Plaintiff's Complaint purports to state a class action claim under the Fair Debt Collection Practices Act against Defendants.
2. Defense counsel was recently retained and has filed an Appearance.
3. Defense counsel has been diligently investigating the allegations of Plaintiff's Complaint.
4. Defendants' responsive pleading is due on December 5, 2007.
5. Defendants hereby request an additional 28 days from December 5, 2007 to answer or otherwise respond to Plaintiff's Complaint, up to and including January 2, 2008.

6. This time is not meant for purposes of unnecessary delay and will not prejudice any party in the litigation. This time is necessary to analyze the pleading and prepare the appropriate response.

7. Defense counsel has contacted Plaintiff's counsel regarding this motion and Plaintiff has no objection to the extension.

WHEREFORE, Defendants, PALISADES ACQUISITION XVI, LLC and BLATT, HASENMILLER, LEIBSKER & MOORE, LLC, respectfully request that this Court grant them a 28-day enlargement of time, up to and including January 2, 2008, to file a responsive pleading to the Plaintiff's Complaint.

Respectfully submitted,

By: s/Stephen D. Vernon

One of the Attorneys for Defendants,

David M. Schultz  
Stephen D. Vernon  
HINSHAW & CULBERTSON LLP  
222 N. LaSalle Street, Suite 300  
Chicago, Illinois 60601  
312-704-3000  
[dschultz@hinshawlaw.com](mailto:dschultz@hinshawlaw.com)  
[svernon@hinshawlaw.com](mailto:svernon@hinshawlaw.com)